

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OHIO STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
et al.,

Plaintiffs,

vs.

JON HUSTED, *et al.*,

Defendants.

Case No.: 2:14-cv-00404

Judge Peter C. Economus

Mag. Judge Norah McCann King

**Renewed Motion and Application of the Ohio General Assembly
for Leave to Intervene, and for Expedited Consideration**

The Ohio General Assembly (the “**General Assembly**”) respectfully moves this Court, pursuant to Fed. R. Civ. P. 24(a)(2) and 24(b), for leave to intervene in order to take appeal from the Court’s September 4, 2014 preliminary injunction order in this case. Since the Court’s injunction requires Ohio’s boards of election to commence early voting on September 30, 2014, a mere 25 days from now, the General Assembly requests the Court’s expedited consideration of this motion so that it can participate in what is expected to be an expedited appeal to the United States Court of Appeals for the Sixth Circuit.

A memorandum in support of this motion is attached hereto and incorporated herein by this reference. A proposed pleading is attached hereto in accordance with Fed. R. Civ. P. 24(c) and a proposed order is also enclosed for this Court’s convenience.

Dated: Cleveland, Ohio
September 5, 2014

Respectfully submitted,

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*Special Counsel for Applicant for Intervention,
Ohio General Assembly*

CERTIFICATE OF SERVICE

I certify that on September 5, 2014, a copy of the foregoing was filed electronically.
Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Patrick T. Lewis

*Special Counsel for Applicant for Intervention,
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